



# City of New Bedford

JONATHAN F. MITCHELL  
MAYOR

## Office of Housing and Community Development

PATRICK J. SULLIVAN  
DIRECTOR

### REQUEST FOR PROPOSALS - INSTRUCTIONS FY 2014 COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS

The City of New Bedford's Office of Housing and Community Development is seeking proposals and input for inclusion in its **Fiscal Year 2014 Action Plan**. The Fiscal Year 2014 Program Year will run from **July 1, 2014, through June 30, 2015**. Successful proposals must address the housing and community development needs presented in the City of New Bedford's Consolidated Plan and must meet the guidelines articulated in this Request for Proposals (RFP).

The Consolidated Plan sets forth the City of New Bedford's community priorities and needs, offering strategies and estimated costs for meeting those needs. The U.S. Department of Housing and Urban Development requires all entitlement communities to create Consolidated Plans and to update them every five (5) years. The FY14 Action Plan will serve as the annual document that will articulate the means by which the goals and objectives of the Consolidated Plan are being met and responded to during the coming fiscal year. This particular Action Plan will represent the fifth of five such annual plans being produced in response to the current Consolidated Plan.

If you are interested in submitting a proposal for consideration, you must complete the attached application form that will be made available online at <http://www.newbedford-ma.gov/cd/welcome.html> and submit it with all required materials by **Friday, February 7, 2014 at 12:00 PM** to the following location:

City of New Bedford Office of Housing and Community Development Attention: Patrick J. Sullivan, Director Anthony S. Catojo, Jr. Building 608 Pleasant Street, 2 <sup>nd</sup> Floor New Bedford, MA 02740
--

Only those proposals submitted for *eligible* activities in accordance with the required format (see attached forms and instructions) will be considered for funding. A summarized list of eligible activities is attached to the proposal form along with a summary of activities that are considered *ineligible*. If you are considering submitting an application for funding and are not sure if the project or program is eligible, you may contact 508-979-1500 for assistance.

In addition, the Office of Housing and Community Development invites you to attend a **Community Development Block Grant Technical Assistance Workshop** at its Offices located at **608 Pleasant Street on Friday, January 10, 2014 at 9:00 A.M.** to assist you with the application process.

Thank you for your interest in the Community Development Block Grant Program.

# CDBG RFP FISCAL YEAR 2014

## TABLE OF CONTENTS

RFP INSTRUCTIONS		RFP PAGE #
I.	General Information	3
II.	Income & Rent Guidelines	4
III.	Eligibility & Selection	5
IV.	Community Development Needs	10
V.	Eligible v. Ineligible Activities	11
VI.	Evaluation of CDBG Proposals	13

PROPOSAL APPLICATION FOR CDBG FUNDING		APPLICATION PAGE #
1.	Project Eligibility Section	2
2.	Project Impact	3
3.	Performance Evaluation Criteria	4
4.	Activity Description	6
5.	Organizational Capacity	7
6.	Financial	9
7.	Public Improvements/Construction Activity Application Form	11
<b>Certifications</b>		
A.	Threshold Certification	14
B.	Statement of Applicant	15
C.	Conflict of Interest Disclosure	17
D.	Tax Compliance Certification	18
E.	Certificate of Non-Collusion	18
F.	Signature Authorization Form	19

## I. GENERAL INFORMATION

### COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAMS

The U.S. Department of Housing and Urban Development (HUD) allocates CDBG funds to state and local governments, who in turn, reallocate them to private non-profit community development corporations, community-based organizations, city departments, and private for-profit corporations, for activities that benefit low and moderate-income areas or low and moderate-income persons.

The City of New Bedford's CDBG Program is designed to expand opportunities for low and moderate-income citizens through the provision of public services, acquisition and improvements to public facilities, neighborhood improvements, housing, and economic development opportunities.

Funding for the FY 2014 Program year available under the CDBG Program is estimated<sup>1</sup> to be in the amount of **\$2,469,532**.

### PROPOSAL REVIEW

Once submitted, no proposal may be amended or substituted, unless the amendment has been requested or permitted by the City. The City, at its sole discretion, reserves the right to contact an applicant if additional information is required. As a courtesy to applicants, staff is always available to provide assistance prior to the application<sup>2</sup> due date.

### TIMEFRAME

The City anticipates, but is not bound by, the following schedule for reviewing submitted proposals and determination of funding awards:

Request for Proposals Timeframe	
RFP Availability Date	January 8 & 9, 2014
Public Meeting Dates	January 8 & 9, 2014
Technical Assistance Workshop	January 10, 2014
Deadline for Proposal Submissions	February 7, 2014 at 12:00pm
Review Period	March 12 – April 11, 2014
Action Plan Development, Public Review Period	March & April 2014
Letters of Award / Denials	May 2014
Funding Year Begins	July 1, 2014

<sup>1</sup> FY2014 allocations are provided by the Department of Housing and Urban Development and are subject to change and modification.

<sup>2</sup> The application and its contents are subject to the U.S. Department of Housing & Urban Development's CDBG Program Rules and Regulations (24 CFR part 570) as amended from time to time in addition to the City of New Bedford's CDBG Program guidelines.

## II. INCOME & RENT GUIDELINES

Every proposal that is approved will be required to provide ongoing evidence that the beneficiaries of the program meet certain income guidelines. For those programs involving housing, affordable rent guidelines are also required.

The Office of Housing & Community Development (OHCD) can assist you in working with these HUD-mandated requirements.

### INCOME GUIDELINES

The following guidelines represent FY2014 income limits by household size and maximum annual income as determined by HUD for assistance under the CDBG 2014 Action Plan.

Maximum Income Levels	
(Based on 80% of Median Family Income)	
Household Size	Annual Income
1 Person	\$33,400
2 Persons	\$38,200
3 Persons	\$42,950
4 Persons	\$47,700
5 Persons	\$51,550
6 Persons	\$55,350
7 Persons	\$59,150
8 or more Persons	\$63,000

### AFFORDABLE RENT GUIDELINES

The following FY2014 rent guidelines are for use in developing your proposal. These rates were established using local Fair Market Rents (FMR), developed by the HUD.

Fair Market Rents		
Unit Size	Maximum Rents (Including Utilities)	Utilities Allowance
SRO	\$653	\$88
1 Bedroom	\$691	\$110
2 Bedroom	\$819	\$146
3 Bedroom	\$1,020	\$181
4 Bedroom	\$1,095	\$229

### III. ELIGIBILITY & SELECTION

The City will evaluate all CDBG proposals in a three-phase process:

1. The first phase will involve a review of the proposals by the staff of the OHCD for conformance to the submission requirements and a determination of whether the proposals meet the minimum criteria established in this RFP. Each proposal will be reviewed for program eligibility under the regulations of the CDBG Program, and feasibility for implementation.
2. The second phase will involve an evaluation of the proposal merits by the staff of the OHCD. During this phase, and at its discretion, City staff may conduct interviews with qualifying applicants and provide the applicant the opportunity to clarify their proposal and advise the City of any additional factors, which may be relevant.
3. The final phase will be a review of the applications and recommendations of the OHCD by the Mayor's Review Committee.

#### ELIGIBLE ACTIVITIES

Before preparing a request for funding, first determine whether or not the proposed activity or project is an eligible activity per federal regulations. The applicable CDBG regulations are located in these RFP instructions. This listing defines eligible and ineligible activities for the respective programs. If the proposal does not meet at least one of the three national objectives for CDBG funding, or is determined to be ineligible under other applicable CDBG regulations, the project cannot be considered for funding.

#### NATIONAL OBJECTIVES (FOR CDBG APPLICATIONS)

The **primary objective** of the CDBG program is to benefit low and moderate-income persons who earn at or below 80% of the median income and/or reside in census tracts with at least 51% low and moderate-income levels. Priority will be given to those applications that meet national objective #1 as stated below. Without exception, all CDBG program activities must meet one of the program National Objectives listed below:

1. **National Objective 1:** Principally benefits low and moderate-income persons who earn at or below 80% of the median income (Code of Federal Regulation citation 570.208(a).)
2. **National Objective 2:** Aids in the prevention or elimination of slums or blight (Code of Federal Regulation citation 570.208(b).)
3. **National Objective 3:** Qualifies as a certified urgent need (Code of Federal Regulation citation 570.208(c).)

Section 570.208 of the Code of Federal Regulations lists the criteria to determine whether a CDBG - assisted activity complies with the national objectives stated above.

## **SELECTION: RANKING CRITERIA FOR FUNDING PROPOSALS**

---

Emphasis will be placed on applicants who meet or exceed the standards discussed in this section. For those providers who are proposing new or expanded programs, emphasis will additionally focus on capacity and exemplary past performance.

Staff will utilize the following criteria, in addition to HUD eligibility requirements and the City's Consolidated Plan priorities, in evaluating proposals submitted for CDBG funding:

### **A. IMPACT ON CONSOLIDATED PLAN PRIORITY NEEDS**

The need for the proposed project will be determined by identifying how the project impacts upon the adopted Consolidated Plan Priority Needs. Therefore, applications must provide a clear explanation of how the project impacts upon Consolidated Plan Priority Needs. Greater consideration will be given to projects that provide a clear description of the project with supporting data and methodology of how the project will meet the Plan's Priority Needs.

### **B. BENEFIT TO LOW AND MODERATE INCOME PERSONS**

The primary objective of the CDBG program is the development of healthy communities "by providing decent housing and a suitable living environment and expanding economic opportunities principally for persons of low and moderate-income." HUD requires that, at a minimum, **70%** of the CDBG money be used for activities that benefit lower income people.

Projects are required to benefit low and moderate-income (LMI) persons and must be designed to include participation by such persons. A CDBG - assisted activity "benefits lower income people" if it meets any one of the four following tests:

1. The **Housing Benefit Test** for measuring lower income benefit.
  - Housing-related CDBG activities "benefit" lower income people only if occupied by low and moderate-income individuals and families.
  - In multifamily buildings (3 or more units), at least 51% of the units must be occupied by low and moderate-income individuals and families.
2. The **Job Creation or Retention Test** for measuring lower income benefit. The business receiving CDBG assistance must justify that the assistance will benefit low and moderate-income individuals. There are two possible ways it can meet this claim:
  - At least 51% of the jobs created or "retained" by the business as a result of the CDBG assistance must be either filled by or "available to" low and moderate income individuals. Jobs are to be counted on a full-time-equivalent basis.
  - "Available to" means either: the job does not require special skills or additional education; or, the business agrees to hire someone and train them for the job. In addition, the business and city must try to ensure that low and moderate-income persons get first consideration for filling the job.

3. The **Limited Clientele Test** for measuring lower income benefit. Some CDBG - assisted activities are either facilities or services that, by their special nature, serve people who might frequently be lower income people. Examples include shelters for abused spouses, or senior citizen centers. HUD calls these "limited clientele activities." To determine whether one of these activities principally benefits lower income people, one of the following tests must be met:
  - Only lower income people are allowed to use the facility or service.
  - The activity requires users to provide information about their family income and size, and at least 51% of the users are lower income.
  - The activity is one that HUD "presumes" that 51% of the users are lower income. For example, HUD "presumes" elderly, handicapped, and illiterate people - among others - are lower income.
4. The **Area Benefit Test** for measuring lower income benefit. Many CDBG activities can benefit all people in an area, no matter what their income is. Examples include: street improvements, neighborhood facilities, and fixing the fronts of stores in neighborhood commercial districts. Such projects must meet the "area benefit test" if they are to be counted as benefiting lower income people. To meet this test, at least 51% of the residents of the "area" must be lower income.

In all cases, all applications scored under the low and moderate-income criterion will include review and scoring of the following:

- LMI benefit activity selected
- How LMI persons will be determined
- The absolute number of persons to be served
- The percent of qualifying LMI persons to be served
- How the low and moderate-income persons will benefit

For the purpose of evaluating project applications, 51% of beneficiaries must be low and moderate-income.

**Projects that cannot demonstrate 51% LMI benefit will not be funded.**

### **C. PROJECT DESCRIPTION, PERFORMANCE EVALUATION CRITERIA & BUDGET**

The content and soundness of all applicants' project design will be evaluated. This evaluation shall include a review of proposed project activities set forth in the narrative and the budget to support these activities.

Several factors will be considered when reviewing a project's budget. All budget reviews will include, but not be limited to, the following considerations:

- Methods used to derive cost estimates
- Completeness and date of cost estimates
- Relationship between cost and the activities to be undertaken
- Cost per unit, if applicable
- Other items deemed relevant to success of the
- proposed activities

### **D. CAPACITY**

Project sponsors must demonstrate the ability to carry out the proposed activities. Project sponsors will be evaluated on experience, administrative capacity, and financial management.

Consideration will be given to current providers with exemplary performance records. Exemplary performance is defined as: receiving a high score in performance evaluations conducted by the OHCD and consistently meeting or exceeding the accomplishment goals established for the CDBG - funded activities.

### **E. LEVERAGE**

Consideration will be given to the amount of non-CDBG funds committed to the project. The greater the financial support or leveraging from local and other sources, the greater the potential impact that CDBG funds will have on meeting local community needs. Documentation must be provided with the application to verify the availability of leverage resources.

### **F. OTHER APPLICATION FACTORS**

Applicants are encouraged to develop a program that has a substantial and comprehensive effect on the needs and conditions identified in their application. These qualities will be carefully evaluated in the review of your application using the evaluation criteria presented on the CDBG Proposal Application Evaluation Worksheet found in these instructions.

It is strongly recommended that you consider these factors before preparing your application, as they are the same factors that will be used to judge the overall feasibility of your proposal.



## HEALTH INITIATIVES:

Please note that programs that serve youth, and offer food and beverages to their participants will be required to make best efforts to follow the nutritional guidelines described below and to incorporate some form of physical activity into their program if at all possible.

- Keep beverage choices healthful. Choose low-fat milk (1 cup serving), water, and moderate amounts of 100% fruit juice (the American Academy of Pediatrics recommends no more than a 6 oz. serving of 100% fruit juice **per day**). Flavored low-fat milk or soymilks are good alternatives.
- Avoid soda, sweetened juice drinks, and sports drinks!
- Look for snacks that have at least **2** grams of fiber per serving listed on the nutrition label.
- Choose whole-grain snacks as much as possible. Look for the word **“whole”** as one of the first ingredients on the product label.
- Keep fresh fruits and veggies readily available. Wash and prepare snacks such as carrot and celery sticks ahead of time, then keep in the refrigerator for easy snacking later.
- Choose low-fat dairy products (for children over age 2), like low-fat cheeses, cottage cheese, sour cream, yogurt, and milk.
- Aim for snacks low in fat, sugar and sodium. The Mayo Clinic recommends choosing snacks that have close to 5% of the daily value for fat, sugar, and sodium and not more than 20% (this is listed on the nutrition facts label)-except nuts and nut butters.
- Snacks that include at least **two** of the major food groups are best (carbohydrates, meats/beans/nuts, dairy, fruits and vegetables). For example, an apple with peanut butter or cottage cheese with peaches.
- Make it a good habit for children to rinse their mouth with water after they finish eating snacks. Sugary snack foods that stick in the teeth pose the greatest risk for tooth decay. Modified from Tufts University, Friedman School, Economics, 2004.

## G. SIGNATURE AUTHORIZATION FORM & DUNS NUMBER

The City of New Bedford Solicitor's Office will verify that the individual providing Signatory Authority on the Signature Authorization Form (RFP Application Page 19) is listed with the Office of the Secretary of the Commonwealth, Corporations Division as the current President or Clerk of your organization's Board of Directors. Prior to completing the Signature Authorization Form, please verify your information by logging on to the Massachusetts Secretary of Commonwealth, Corporations Division at the following link: <http://corp.sec.state.ma.us/corp/corptest/corpsearchinput.asp>. Follow the instructions present on the form.

The signatures of the President or Secretary currently registered with the Office of the Secretary of the Commonwealth, Corporations Division are the only valid signatures that can be used when completing the Signature Authorization Form.

The Federal Government now requires all applicants for Federal assistance to obtain a Data Universal Numbering System (DUNS) number provided by Dun & Bradstreet. Assignment of the number is FREE and can be obtained by phone at 1.866.705.5711 or online at <http://fedgov.dnb.com/webform>. The phone process takes about 5-10 minutes and the online registration process may take a few days.

## IV. COMMUNITY DEVELOPMENT NEEDS

### Consolidated Plan.2010-2014

#### Housing and Community Development Needs and Priorities

Needs	Priorities
<b>HOUSING</b>	<ul style="list-style-type: none"> <li>Improve the overall quality of housing stock in the City of New Bedford.</li> <li>Provide equal access to affordable housing for all residents in the City of New Bedford.</li> <li><b>High Priority:</b> Increase homeownership and rental opportunities for low and moderate-income households, address lead paint, improve energy efficiency. Address abandoned buildings. Improve the quality and livability of City neighborhoods.</li> </ul>
<b>PUBLIC SERVICES</b>	<ul style="list-style-type: none"> <li>Provide access to a variety of services including handicapped legal and language barrier assistance, transportation, substance abuse, health and mental health services and educational opportunities for the low and moderate-income population in New Bedford.</li> <li>Increase accessibility and opportunities for all low and moderate-income persons including medical, art recreation and advocacy programming.</li> <li><b>High Priority:</b> Anti-Crime Programs, Youth Services, Employment Training, Health Services and programs that encourage good nutrition and physical activity, Homeless Services, Child care.</li> </ul>
<b>INFRASTRUCTURE</b>	<ul style="list-style-type: none"> <li>Provide greater access through the removal of architectural barriers.</li> <li>Sustainability improvements (alternative energy and transportation, energy efficiency, water conservation, etc.)</li> <li><b>High Priority:</b> Park and Playground improvements, creation of athletic playing fields – soccer, fields, upgrading water/sewer systems and streets, development of vacant lots, neighborhood restoration.</li> </ul>
<b>PUBLIC FACILITIES</b>	<ul style="list-style-type: none"> <li>Improve a wide range of public facilities benefiting low and moderate-income individuals and families.</li> <li><b>High Priority:</b> ADA Compliance to public buildings, public safety building improvements, general improvements to public facilities – community/youth centers, sustainability Improvements, the clean-up of contaminated sites and non-residential historic preservation.</li> </ul>
<b>ECONOMIC DEVELOPMENT</b>	<ul style="list-style-type: none"> <li>Improve publicly or privately owned commercial property.</li> <li>Increase English as a second language and job training programs to assist the labor force.</li> <li>Provide technical assistance to existing and potential micro-enterprises.</li> <li><b>High Priority:</b> Provide financial assistance to for-profit business ventures that hire/retain low-moderate income labor force, Micro-enterprise assistance, Brownfield redevelopment, Job training/development programs.</li> </ul>
<b>HOMELESSNESS</b>	<ul style="list-style-type: none"> <li>Improve a wide range of housing and services throughout the Continuum of Care including outreach, homelessness prevention, advocacy, support services, and shelter operations.</li> </ul>
<b>PLANNING &amp; ADMINISTRATION</b>	<ul style="list-style-type: none"> <li>Provide for the administration of all entitlement programs in the City benefiting low/moderate income individuals/households, undertake fair housing activities, increase accessibility to public information.</li> </ul>

## **V. ELIGIBLE v. INELIGIBLE ACTIVITIES INFORMATION**

### **ELIGIBLE ACTIVITIES\***

Activities that are eligible for CDBG funding include, but are not limited to:

- Planning;
- CDBG Program administration costs;
- Economic Development activities, including microenterprise assistance and lending to for-profit businesses;
- Public services, such as employment assistance, crime prevention, substance abuse, child care, health care, transportation, fair housing counseling, etc.;
- Acquisition of real property;
- Clearance and demolition;
- Rehabilitation of privately or publicly owned commercial, residential and industrial buildings;
- Housing rehabilitation;
- Construction, reconstruction or installation of public facilities including, but not limited to the creation of parks, playgrounds, streets and sidewalks, public buildings (except for buildings for the general conduct of government);
- Historic Preservation;
- Related relocation, clearance and site improvements, and;
- Homeownership assistance.

### **INELIGIBLE ACTIVITIES:**

The lists of activities that are not eligible for CDBG funding include, but are not limited to:

- Buildings used for the general conduct of government;
- Purchase of equipment (if not part of an eligible program);
- Operating and maintenance expenses;
- General Maintenance and/or repair of public facilities and infrastructure;
- Payment of salaries for staff, utility costs and similar expenses necessary for the operation of public works and facilities;
- General government expenses;
- Political activities, and;
- New housing construction.

***\*NOTE: The eligibility of listed activities may be limited by additional regulatory conditions.***

## **SELECTION: RATING CRITERIA FOR FUNDING PROPOSALS**

---

Emphasis will be placed on applications that meet or exceed the standards discussed in this section. For those applicants who are proposing new or expanded programs, emphasis will additionally focus on capacity and exemplary past performance.

The OHCD Staff and Review Community will utilize the following criteria, in addition to HUD eligibility requirements and the City's Consolidated Plan priorities, in evaluating proposals submitted for CDBG funding:

### **A. IMPACT ON CONSOLIDATED PLAN PRIORITY NEEDS AND OBJECTIVES**

The need for the proposed project will be determined by identifying how the project impacts the Consolidated Plan Priority Needs. Therefore, applications must provide a clear explanation of how the project impacts upon Consolidated Plan Priority Needs. Greater consideration will be given to projects that provide a clear description of the project with supporting data and methodology of how the project will meet the Plan's Priority Needs.

### **B. PROJECT DESCRIPTION, PERFORMANCE MEASUREMENTS & BUDGET**

The content and soundness of the applicant's project design will be evaluated. This evaluation will include a review of proposed project activities set forth in the narrative and the budget to support these activities. Several factors will be considered when reviewing a project's budget. All budget reviews will include:

Methods used to derive cost estimates:

- Completeness and timeliness of cost estimates;
- Relationship between cost and the activities to be undertaken;
- Cost per unit, if applicable;
- Availability of other funding, if needed, to undertake the proposed activities;
- Other items deemed relevant to the success of the proposed activities;

### **C. CAPACITY**

Applicants must demonstrate the ability to carry out the proposed activities within their schedule and proposed budget. You will be evaluated on experience, administrative capacity, and financial management capacity. For currently or previously funded CDBG Projects consideration will be given to exemplary performance records. Exemplary performance is defined as: consistently meeting or exceeding the accomplishment goals and reporting requirements established for the CDBG-funded activities.

### **D. LEVERAGE**

Consideration will be given to the amount of non-CDBG funds committed to the project. The greater the financial support or leveraging from local and other sources, the greater the potential impact that CDBG funds will have on meeting local community needs. Participation of volunteers will also be considered in the leverage evaluation. Applicants are encouraged to consider collaboration with other organizations having similar objectives. Documentation must be provided with the application to verify the availability of leverage resources.

### **E. FINANCIAL ADMINISTRATION**

Please contact the OHCD at 508.979.1500 should you have any questions concerning this process or the application, itself.

## VI. EVALUATION OF CDBG PROPOSALS

CDBG funds are awarded through a competitive proposal evaluation process. The evaluation considers all aspects of the proposal as described in the RFP and proposal application.

Proposals are reviewed by the staff of the City's OHCD who first review each application for threshold information [completeness of application] and then for content. OHCD Staff review each proposal, ranking them using the City's OHCD Proposal Application Evaluation Worksheet. Should a question arise during its review, the OHCD reserves the right to contact the applicant for clarification. The results of those evaluations are then presented to the Mayor's Review Committee that renders the final decision on grant awards.

While a well-written proposal is no guarantee of funding, this is a highly competitive process where the completeness, conciseness, and responsiveness to the criteria described in the RFP is of the utmost importance.

Evaluation Factors		
<b>Quality of Program Design – 25 points</b>		<b>Points: _____</b>
1	Does the proposed program/project comply with the overall regulations, goals and objectives of the CDBG program?	
2	Does the application include a demonstration of unmet need?	
3	Is the application proposal consistent with the needs and priorities of the New Bedford Consolidated Plan?	
4	Overall program merit including coordination with existing services [non-duplication] and evidence of community support	
<b>Proposed Accomplishments – 25 points</b>		<b>Points: _____</b>
5	Are the program activities and goals clearly defined?	
6	Are there meaningful outcomes and outputs for the proposed program activities?	
7	Does the proposed program/project take into consideration the collaboration of resources with other public and/or private development efforts to be more effective and efficient?	
<b>Capacity and Experience – 25 points</b>		<b>Points: _____</b>
8	Does the organization have the experience and staff qualifications to meet their intended program goals? Does the organization have the financial capacity and internal controls to ensure its compliance with standard fiscal practices and to ensure its ongoing sustainability?	
9	Has the organization demonstrated past experience in implementing and complying with federal regulations?	
10	Has the organization demonstrated an ability to deliver their services?	
<b>Financial Administration – 25 points</b>		<b>Points: _____</b>
11	Does the organization has the qualified staff to oversee financial operations?	
12	Does the agency expend previous funding in a timely manner, and have previous funding allocations been expended within the program year?	
13	Does the agency have any outstanding financial concerns or findings?	